

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Reform, 1996

Docket No. MC96-3

FIRST SET OF INTERROGATORIES OF
THE NEWSPAPER ASSOCIATION OF AMERICA
TO POSTAL SERVICE WITNESS
CARL E. STEIDTMANN (NAA/USPS-T2-1)
(August 7, 1996)

The Newspaper Association of America ("NAA"), pursuant to Rules 25 and 26 of the Commission's Rules of Practice, hereby submits its first set of interrogatories to USPS witness Steidtmann and requests a timely response under oath. If Mr. Steidtmann cannot answer any interrogatory, please readdress that interrogatory to a witness who can.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

August 7, 1996

William B. Baker
William B. Baker



NEWSPAPER ASSOCIATION OF AMERICA INTERROGATORIES
TO POSTAL SERVICE WITNESS CARL E. STEIDTMANN
(FIRST SET)

NAA/USPS-T2-1. At page 1, lines 16-18 of your testimony, you state that "Special services, and postal products in general, face different cost, market, and competitive considerations. For example, within special services, the competition and market for post office boxes differ from those for services such as special delivery mail."

- a. Has the Postal Service advertised its post office box services?
- b. Has the Postal Service advertised any other service that faces similar competition by private service providers in the market place?
- c. If your answer to either part a or part b is yes, please provide data reflecting the amount the Postal Service spent on advertising in the most recent fiscal year for which data is available. Please provide a citation for the advertising sum in the current filing and/or library references.

NAA/USPS-T2-2. Suppose an entity is able successfully to raise price in a market in which it faces competition. Would one explanation for this phenomenon be that it previously had been pricing below cost?